

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

DR. THOMAS HUBBARD, PhD,

Plaintiff,

v.

SARAH ALLEN BLAKEMORE and JOHN
DOES 1-10,

Defendants.

Case No. 1:20-cv-767

DECLARATION OF SHERRARD (BUTCH) HAYES

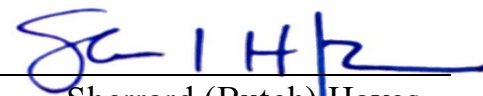
EXHIBIT B

Pursuant to the provisions of 28 U.S.C. § 1746, I, SHERRARD (BUTCH) HAYES, voluntarily make the following Declaration based upon personal knowledge and declare under penalty of perjury and the laws of the United States that the following is true and correct:

1. “My name is SHERRARD (BUTCH) HAYES. I have been licensed to practice law in Texas for 29 years. I have never been convicted of a felony and suffer from no legal infirmities. The following is based upon my personal knowledge.

2. “I am counsel for Thomas Hubbard, who was a professor of Classics at The University of Texas – Austin for more than three decades. I represented Dr. Hubbard in connection with his claims against UT-Austin in 2020 and 2021, and in particular in connection with his charge of discrimination filed with the EEOC. That Charge involved allegations of hostile environment, some of which arose from the conduct of certain students, including Ms. Blakemore.
3. “On June 2, 2021, Dr. Hubbard and The University of Texas reached a mutually-acceptable settlement consistent with the agreement made part of this Court’s file. It was subject to certain approvals, which were provided in the days following. The settlement was finalized, and the University has made payment in full to Dr. Hubbard consistent with its terms.
4. “Prior to that day, Dr. Hubbard had not received an offer of settlement from The University of Texas in connection with my representation. The amount received by Dr. Hubbard was far in excess of the statutory damage caps associated with the statutes he invoked in his dealings with the EEOC.

August 20, 2021


Sherrard (Butch) Hayes